

depositions, so as to be able to effectively prosecute his case and defend against Defendants' Motion to Dismiss.

Respectfully submitted, this the 9th of October, 2020.

MICHAEL D. WATSON, JR., IN HIS
OFFICIAL CAPACITY AS
SECRETARY OF STATE AND
TRUSTEE OF THE PUBLIC
TIDELANDS TRUST

BY: BALCH & BINGHAM LLP

BY: s/ K.C. Hightower
Of Counsel

Ben H. Stone (MSB# 7934)
Terese T. Wyly (MSB# 7414)
Bradley A. Ennis (MSB# 103319)
K.C. Hightower (MSB# 101246)
Katie Hood (MBS# 104659)
Susan Scaggs (MSB# 105727)
BALCH & BINGHAM LLP
1310 Twenty Fifth Avenue
Gulfport, MS 39501
Telephone: (228) 864-9900
Facsimile: (228) 864-8221
bstone@balch.com
twyly@balch.com
bennis@balch.com
kchightower@balch.com
khoo@balch.com
sscaggs@balch.com

CERTIFICATE OF SERVICE

I hereby certify that I have, this the 9th day of October, 2020, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which delivered a copy of the same to all counsel of record who have properly registered with the ECF system.

s/ K.C. Hightower

Of Counsel